

Defendant Wise refers the Court and all parties to the deposition transcript errata sheets for her April 13, 2022 30(b)(6) deposition, April 14, 2022 30(b)(1) deposition, and April 18, 2023 30(b)(6) deposition, which are attached hereto as Exhibits A, B, and C, respectively. The parties' designations indicated below should be amended to reflect the errata.

Objections to HAUL Plaintiffs' Deposition Designations

HAUL Plaintiffs' Designations <i>(April 13, 2022)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
1:15-25			
183:23-184:3		183:7-22	

Objections to LULAC Plaintiffs' Deposition Designations

LULAC Plaintiffs' Designations <i>(April 14, 2022)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
14:3-19:3			
45:16-48:11			
89:2-98:25		78:20-79:2 See errata (Exhibit B) re: 90:6-7, 98:4-5	
100:3-106:16		99:20-100:2 See errata (Exhibit B) re: 101:4-5	
156:23-159:14			
167:7-23			
198:19-200:14			
212:16-20			

LULAC Plaintiffs' Designations <i>(April 18, 2023)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
13:1-14:3			
91:20-92:16		See errata (Exhibit C) re: 92:7-8	
94:1-95:19		93:9-25 See errata (Exhibit C) re: 94:25, 95:7-10, 95:18	
97:15-22			
109:15-110:25			

Objections to the United States' Deposition Designations

United States' Designations <i>(April 13, 2022)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
11:3-4			
11:7-12			
12:23-13:2			
32:12-33:11			
71:8-21		See errata (Exhibit A) re: 71:11-13	
77:22-78:14		See errata (Exhibit A) re: 78:12	
117:12-22			
117:23-118:21			
119:15-120:1			
120:13-121:13			
122:14-123:2			
127:20-128:8			
128:16-129:6			
131:3-22			
133:14-134:11			
139:1-8			
142:13-143:16			
146:20-147:20			
147:25-148:14			
149:4-7			

United States' Designations <i>(April 13, 2022)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
150:11-151:4			
151:9-25			
153:20-154:3		152:14-153:5	
161:5-20			
161:21-162:9			
174:7-24			
207:24-208:3			
212:3-10			

United States' Designations <i>(April 14, 2022)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
9:10-17			
9:25-10:1			
13:16-14:20			
15:11-15			
33:2-35:5			
39:1-20			
45:16-46:4			
46:5-17			
99:1-16		78:20-79:2	
99:17-100:17			
100:18-102:9		See errata (Exhibit B) re: 101:4-5	
102:10-14			
105:6-106:14			
107:15-110:1			
110:2-20			
111:6-19			
112:8-114:25			
115:1-6			
115:7-116:17			
117:7-118:2			
118:3-12			
136:11-16			

United States' Designations <i>(April 14, 2022)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
136:17-22			
139:17-24			
242:19-243:11			
247:4-12			

United States' Designations <i>(April 18, 2023)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
7:6-8			
7:15-21			
12:4-25		See errata (Exhibit C) re: 12:16-22	
13:1-25			
36:19-37:8		See errata (Exhibit C) re: 37:7	
39:23-40:15			
43:3-13			
50:21-52:5		See errata (Exhibit C) re: 51:16	
56:2-19			
58:11-23		<p>See errata (Exhibit C) re: 58:14 (“8,866, excluding FPCA and including ballots received late, and 8,017 excluding both FPCA and ballots received late”)</p> <p>See errata (Exhibit C) re: 58:21 (“8,103, including FPCA, and 7,859 not including FPCA”)</p> <p>See errata (Exhibit C) re: 58:23 (“158 were rejected for reasons other than untimeliness”)</p>	
59:12-60:9		<p>54:19-24</p> <p>See errata (Exhibit C) re: 60:3-4</p>	
60:23-61:16			
65:12-25			

United States' Designations <i>(April 18, 2023)</i>	Defendant Wise's Objection(s)	Counter-Designations / Testimony to include for completeness under FRE 106	Sustained / Overruled
79:19-80:7			
89:12-90:3			
93:9-94:8			
94:14-95:16		See errata (Exhibit C) re: 94:25, 95:7-10	
97:10-22			
97:23-99:1		See errata (Exhibit C) re: 98:14	
99:2-6			
105:1-23		See errata (Exhibit C) re: 105:11	
106:2-18		See errata (Exhibit C) re: 106:10-11	
109:1-6			
109:7-14			
109:15-22			
109:23-110:4			
110:5-11			
110:12-18			
110:19-25			
112:6-21			
120:9-121:14		See errata (Exhibit C) re: 121:2, 9	
124:7-125:22		See errata (Exhibit C) re: 125:14	
126:4-127:18			
129:10-131:1		See errata (Exhibit C) re: 129:19	
132:23-133:1			
133:8-134:17		See errata (Exhibit C) re: 134:3-4	
135:9-18			
137:22-139:2		See errata (Exhibit C) re: 138:24-25	
139:16-140:1			
149:16-25			

Dated: August 15, 2023

/s/ Kathleen Hartnett

Kathleen Hartnett* (CA SBN 314267)

COOLEY LLP

Kathleen Hartnett* (CA SBN 314267)

khartnett@cooley.com

Beatriz Mejia* (CA SBN 190948)

bmejia@cooley.com

Sharon Song* (CA SBN 313535)

ssong@cooley.com

Kelsey Spector* (CA SBN 321488)

kspector@cooley.com

Germaine Habell* (CA SBN 333090)

ghabell@cooley.com

Caroline A. Lebel* (CA SBN 340067)

clebel@cooley.com

3 Embarcadero Center, 20th Floor

San Francisco, CA 94111-4004

Telephone: +1 415 693-2000

Facsimile: +1 415 693-2222

COOLEY LLP

Orion Armon (CO SBN 34923)

oarmon@cooley.com

1144 15th Street, Suite 2300

Denver, CO 80202-2686

Telephone: +1 720 566-4000

Facsimile: +1 720 566-4099

STATES UNITED DEMOCRACY CENTER

Christine P. Sun* (CA SBN 218701)

3749 Buchanan St., No. 475165

San Francisco, CA 94147-3103

Telephone: +1 615 574-9108

christine@statesuniteddemocracy.org

STATES UNITED DEMOCRACY CENTER

Ranjana Natarajan (TX SBN 24071013)

1801 E 51st St., Suite 365, No. 334

Austin, TX 78723

Telephone: +1 323 422-8578

ranjana@statesuniteddemocracy.org

STATES UNITED DEMOCRACY CENTER
Robert Cotter* (IL SBN 6334375)
7510 N. Greenview Ave., Apt. #3
Chicago, IL 60626
Telephone: (224) 235-2606
robert@statesuniteddemocracy.org

STATES UNITED DEMOCRACY CENTER
Marina Eisner* (DC SBN 1005593)
1101 17 Street NW
Washington, DC 20036
Telephone: (240) 600-1316
marina@statesuniteddemocracy.org

EL PASO COUNTY ATTORNEYS
Jo Anne Bernal (TX SBN 02208720)
El Paso County Attorney
Joanne.Bernal@epcounty.com
John E. Untereker (TX SBN 24080627)
Assistant County Attorney
juntereker@epcounty.com
500 East San Antonio, Room 503
El Paso, Texas 79901
Telephone: +1 915 546-2050
Facsimile: +1 915 546-2133

*Attorneys for Defendant Lisa Wise, in her
official capacity as the El Paso County
Elections Administrator*

CERTIFICATE OF SERVICE

I certify that on August 15, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Kathleen Hartnett
Kathleen Hartnett